

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ROBIN BREDA, *on behalf of herself and
all others similarly situated,*

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a
VERIZON WIRELESS,

Defendant.

Civil Action No. 1:16-cv-11512-DJC

STIPULATION REGARDING PLAINTIFF'S DISCOVERY REQUESTS

WHEREAS, (i) on April 24, 2020, plaintiff Robin Breda (“**Plaintiff**”) served a “Second Set of Written Discovery Requests” on defendant Cellco Partnership d/b/a Verizon Wireless (“**Verizon**”), which contains Interrogatory Nos. 20-22 and Requests for Production Nos. 1-3, and (ii) on April 27, 2020, Plaintiff served a “Third Set of Written Discovery Requests” on Verizon, which contains Request for Production No. 1 (Second and Third Set of Written Discovery Requests together, “**Supplemental Discovery Requests**”); and

WHEREAS, on May 1, 2020, the parties’ counsel conferred about (i) Plaintiff’s request for “subsequent call data” (i.e., calls made to a telephone number *after* the called party pressed “2” in response to a call to that telephone number), (ii) the Supplemental Discovery Requests, and (iii) Verizon’s general objections to the Supplemental Discovery Requests; and

WHEREAS, to avoid a further discovery dispute and further taxing the Court’s and parties’ time and resources, Plaintiff and Verizon hereby **STIPULATE** and **AGREE** as follows:

1. The deadlines for Verizon to serve its objections and responses to Plaintiff’s Supplemental Discovery Requests are stayed pending production of the information described in paragraph 2, below. Verizon expressly reserves all of its objections to the Supplemental Discovery Requests.

2. Verizon shall produce to Plaintiff LiveVox call dialer records (“**Dialer Records**”) available to and provided by LiveVox concerning (i) *outgoing* calls during the putative class period to mobile telephone numbers associated with Verizon customer accounts that were intended to be made to Verizon customers regarding the status of their account (regardless of whether a called party pressed “2” in response to a call) and (ii) all *incoming* calls associated with those outgoing calls; provided, however, that Verizon shall exclude Dialer Records for calls made to mobile telephone numbers (“**MTNs**”) that were identified as Verizon MTNs at the time the calls were made.

3. After Plaintiff and/or her expert reviews the Dialer Records, the parties will negotiate search terms, date restrictions and other methods for Verizon to systematically search for account remarks, if any, associated with the Verizon accounts called.

4. If after reviewing the Dialer Records Plaintiff determines that she wants to move forward with the Supplemental Discovery Requests notwithstanding production of the Dialer Records, Plaintiff will notify Verizon in writing of her intent to do so. Verizon shall have ten (10) days following written notice from Plaintiff to serve its responses and objections to the Supplemental Discovery Requests.

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IT IS HEREBY STIPULATED:

ROBIN BREDA,

By her attorneys,

/s/ Keith J. Keogh

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-and-

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS,

By its attorneys,

/s/ Emily H. Bryan

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DATED: May 29, 2020

IT IS HEREBY SO ORDERED:

Dated: _____

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent all those non-registered participants on May 29, 2020.

/s/ David G. Thomas